

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CHARLES BARTON BOLLFRASS,  
Plaintiff,  
- against -  
WARNER MUSIC GROUP CORP.,  
Defendant.

12-cv-6348(LSS)

**NOTICE OF MOTION TO DISMISS  
PURSUANT TO FED. R. CIV. P. 12(b)(6)  
AND MOTION FOR AN AWARD OF  
ATTORNEYS' FEES**

**PLEASE TAKE NOTICE** that, upon the Memorandum of Law in Support of Defendants' Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b)(6), the accompanying Declaration of Marc S. Reiner and the exhibits attached thereto, and all prior pleadings and proceedings in this action, defendant Warner Music Group Corp. will move this Court at a time to be determined at the Court's convenience, for an Order: (1) dismissing the Complaint in its entirety; (2) awarding Warner Music Group Corp. its fees and costs incurred in this action; and (3) granting such other and further relief as the Court deems just and proper.

Dated: December 4, 2012

**ANDERSON KILL & OLICK, P.C**

By: /s/ Marc S. Reiner

Marc S. Reiner (MR-6669)  
1251 Avenue of the Americas  
New York, New York 10020  
Telephone: (212) 278-1000  
Facsimile: (212) 278-1733

*Attorneys for Defendant  
Warner Music Group Corp.*